

September 22, 2016

VIA U.S. Mail

Vanessa Young
Staff Counsel
Office of Enforcement
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100

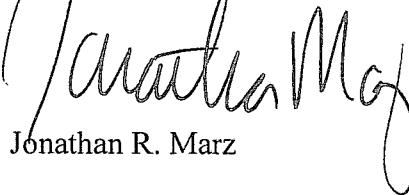
Re: *CMC Land Holdings LLC's Response to Special Interrogatories*

Dear Ms. Young:

Please find enclosed CMC Land Holdings LLC's Response to Special Interrogatories, as well as two documents referenced in those responses (CMC 000261 – 000265). Please do not hesitate to contact us with any questions.

Sincerely,

DIEPENBROCK ELKIN GLEASON LLP



Jonathan R. Marz

JRM/klh

cc: Nicole Gleason

Enclosures

1 NICOLE R. GLEASON (SBN 199655)
JONATHAN R. MARZ (SBN 221188)
2 DIEPENBROCK ELKIN GLEASON LLP
500 Capitol Mall, Suite 2200
3 Sacramento, CA 95814-4413
Telephone: (916) 492-5073 5048
4 Facsimile: (916) 446-2640

5 Attorneys for
CMC LAND HOLDINGS LLC
6

7 **BEFORE THE STATE WATER RESOURCES CONTROL BOARD**
8 **STATE OF CALIFORNIA**

9 In the Matter of the Investigation of:
10

11 CMC LAND HOLDINGS LLC
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**RESPONSE TO SPECIAL
INTERROGATORIES**

CMC Land Holdings LLC hereby responds to State Water Resources Control Board's Special Interrogatories as follows:

GENERAL OBJECTIONS

These responses and objections are made solely for the purpose of this matter. Each response is subject to all objections as to competence, relevance, materiality, propriety and admissibility, and any and all other objections and grounds that would require exclusion of the response, or any part thereof, if any of these interrogatories were asked of, or any statements contained herein were made by, witnesses present and testifying before the State Water Resources Control Board or in Court, all of which objections and grounds are reserved and may be interposed at the time of any later hearing or proceeding related to this matter.

The following responses are based on information presently known and available to Responding Party, and which information Responding Party is informed and believed is true. Discovery is still ongoing and Responding Party reserves the right to introduce subsequently discovered information at any later hearing or proceeding related to this matter.

The fact that Responding Party has responded to or objected to any Interrogatory or part thereof may not be taken as an admission that Responding Party accepts, or admits the existence of any facts set forth or assumed by such Interrogatory or that such response constitutes admissible evidence. The fact that Responding Party has answered part or all of any Interrogatory shall not be construed to be a waiver by Responding Party of any objection to part or all of any Interrogatory. Nothing contained herein shall be construed as an admission. No incidental or implied admissions whatsoever are intended by this response.

To the extent that part or all of any Interrogatory calls for information which constitutes material prepared in anticipation of any later hearing or proceeding related to this matter, or litigation or for trial, or for information or material covered by the work-product doctrine, or which constitutes information which is protected from disclosure by

1 virtue of a privilege, Responding Party objects to each and every such Interrogatory and/or
2 each and every subpart of any Interrogatory and, hence, will not supply or render any
3 information or material protected from discovery by virtue of the work-product doctrine,
4 (see e.g., C.C.P. 2018.020) or any privilege, including, but not limited to, the attorney-client
5 privilege (see e.g., Evid. Code section 950 et sq.).

6 To the extent that any Interrogatory seeks information not in the possession, custody
7 or control of Responding Party, or any of its present representatives, agents or employees,
8 Responding Party objects on the grounds that such Interrogatory is overly broad, would
9 impose an undue burden and expense on Responding Party, and seeks information which is
10 not relevant to the subject matter of this action nor reasonably calculated to lead to the
11 discovery of admissible evidence.

12 To the extent that any Interrogatory seeks "all" or "any and all" facts upon which a
13 contention is based, Responding Party objects on the grounds that such request is overly
14 broad, general, vague and/or ambiguous, and would impose an undue burden and expense
15 on Responding Party.

16 The above-entitled objections are hereby made applicable to each and all of these
17 requests and are incorporated therein by reference as if fully set forth in each response to
18 each Interrogatory.

19 RESPONSE TO SPECIAL INTERROGATORIES

20 SPECIAL INTERROGATORY NO. 1

21 IDENTIFY ALL PERSONS answering or supplying information to these
22 interrogatories.

23 RESPONSE NO. 1

24 Responding Party objects that this interrogatory is compound insofar as the term
25 "IDENTIFY" embraces several discrete pieces of information for any person identified in a
26 response to this interrogatory, and because the interrogatory is phrased in the disjunctive
27 (i.e., "answering or supplying"), which violate Code of Civil Procedure section 2030.060(f).
28 Responding Party also objects to the extent that this request calls for information that

1 violates the attorney-client privilege and attorney work product rule. Subject to and without
2 waiving said objections, Responding Party responds as follows:

3 CMC Land Holdings LLC, including Mike Borba,, c/o Nicole Gleason of
4 Diepenbrock Elkin Gleason LLP, 500 Capitol Mall, Suite 2200, Sacramento, CA 95814,
5 (916) 492-5000.

6 Tony Machado, c/o Jeffrey S. Kaufman of Berliner Cohen LLP, 2844 Park Avenue,
7 Merced, CA 95348; (209) 385-0700.

8 Nicole Gleason and Jonathan Marz of Diepenbrock Elkin Gleason LLP, 500 Capitol
9 Mall, Suite 2200, Sacramento, CA 95814, (916) 492-5000, and George Rodarakis of
10 Rodarakis & Sousa, 1301 L Street, Suite 4, Modesto, CA 95354, as to objections only.

11 **SPECIAL INTERROGATORY NO. 2**

12 IDENTIFY ALL DOCUMENTS used in answering or supplying information to
13 these interrogatories.

14 **RESPONSE NO. 2**

15 Responding Party objects that this interrogatory is compound insofar as the term
16 “IDENTIFY” embraces several discrete pieces of information for any person identified in a
17 response to this interrogatory, and because the interrogatory is phrased in the disjunctive
18 (i.e., “answering or supplying”), which violate Code of Civil Procedure section 2030.060(f).
19 Responding Party also objects to the extent that this request requires identification of
20 documents that, if identified, would violate the attorney-client privilege or attorney work
21 product doctrine. Subject to and without waiving said objections, Responding Party
22 responds as follows:

23 1) Email dated June 2014 regarding the sale of Nunes cows.

24 2) Manure tracking sheet.

25 **SPECIAL INTERROGATORY NO. 3**

26 IDENTIFY the duration of time the flush pumps at the SITE were operating on
27 November 20, 2015.

28

1 **RESPONSE NO. 3**

2 Responding Party objects that this interrogatory is vague, ambiguous, and
3 unintelligible as phrased, because, as defined, the term "IDENTIFY" relates to persons or
4 documents, not times or time durations. Subject to and without waiving said objections,
5 Responding Party responds as follows:

6 Responding Party is informed and believes that the flush pumps were not operating
7 on November 20, 2015, because they had been turned off prior to their scheduled 8:00 a.m.
8 start time. Discovery is ongoing and continuing.

9 **SPECIAL INTERROGATORY NO. 4**

10 IDENTIFY the duration of time the flush pumps at the SITE were operating on
11 November 19, 2015.

12 **RESPONSE NO. 4**

13 Responding Party objects that this interrogatory is vague, ambiguous, and
14 unintelligible as phrased, because, as defined, the term "IDENTIFY" relates to persons or
15 documents, not times or time durations. Subject to and without waiving said objections,
16 Responding Party responds as follows:

17 Responding Party is informed and believes the flush pumps were scheduled to run on
18 November 19, 2015, for 40 minutes beginning at 8:00 a.m., and for 40 minutes beginning at
19 8:00 p.m. Discovery is ongoing and continuing.

20 **SPECIAL INTERROGATORY NO. 5**

21 IDENTIFY the frequency and duration the flush pumps operated in November 2014
22 and November 2015 at the SITE.

23 **RESPONSE NO. 5**

24 Responding Party objects that this interrogatory is vague, ambiguous, and
25 unintelligible as phrased, because, as defined, the term "IDENTIFY" relates to persons or
26 documents, not times or time durations. Responding Party also objects that this
27 interrogatory is compound (i.e., "frequency and duration"), which violates Code of Civil

28 ///

1 Procedure section 2030.060(f). Subject to and without waiving said objections, Responding
2 Party responds as follows:

3 Responding Party is informed and believes that in November 2014 and November
4 19, 2015, the flush pumps were scheduled to run twice daily: for 40 minutes beginning at
5 8:00 a.m., and for 40 minutes beginning at 8:00 p.m. Discovery is ongoing and continuing.

6 **SPECIAL INTERROGATORY NO. 6**

7 IDENTIFY the frequency and duration the flush pumps operated in December 2014
8 and December 2015 at the SITE.

9 **RESPONSE NO. 6**

10 Responding Party objects that this interrogatory is vague, ambiguous, and
11 unintelligible as phrased, because, as defined, the term "IDENTIFY" relates to persons or
12 documents, not times or time durations. Responding Party also objects that this
13 interrogatory is compound (i.e., "frequency and duration"), which violates Code of Civil
14 Procedure section 2030.060(f). Subject to and without waiving said objections, Responding
15 Party responds as follows:

16 Responding Party is informed and believes that in December 2014 and December
17 2015, the flush pumps were scheduled to run twice daily: for 40 minutes beginning at 8:00
18 a.m., and for 40 minutes beginning at 8:00 p.m. Discovery is ongoing and continuing.

19 **SPECIAL INTERROGATORY NO. 7**

20 IDENTIFY the standard operating procedures for operating the flush pumps at the
21 SITE.

22 **RESPONSE NO. 7**

23 Responding Party objects that this interrogatory is vague and ambiguous as to time,
24 and as to the meaning of the term "standard operating procedures," and vague, ambiguous,
25 and unintelligible as phrased, because, as defined, the term "IDENTIFY" relates to persons
26 or documents, not a "procedure" or process. Subject to and without waiving said
27 objections, Responding Party responds as follows:

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1 Responding Party is informed and believes that the flush pumps are on automatic
2 timers that are adjusted twice a year for daylight savings. Discovery is ongoing and
3 continuing.

4 **SPECIAL INTERROGATORY NO. 8**

5 IDENTIFY all dates from when you acquired ownership of the SITE when the
6 settling basin depicted in Photograph 1 in the attached Exhibit A was emptied of all
7 wastewater.

8 **RESPONSE NO. 8**

9 Responding Party objects that this interrogatory is vague and ambiguous as to the
10 meaning of the term “wastewater,” and vague, ambiguous, and unintelligible as phrased,
11 because, as defined, the term “IDENTIFY” relates to persons or documents, not dates or
12 times. Subject to and without waiving said objections, Responding Party responds as
13 follows:

14 May 2015. Discovery is ongoing and continuing.

15 **SPECIAL INTERROGATORY NO. 9**

16 For each date identified in response to Interrogatory No. 8, state the volume of solid
17 waste accumulated in the settling basin.

18 **RESPONSE NO. 9**

19 Responding Party objects that this interrogatory is vague and ambiguous as to the
20 meaning of the term “solid waste,” and the term “accumulated” as it is used in this context.
21 Subject to and without waiving said objections, Responding Party responds as follows:

22 None; there were no solids in the settling basin at the referenced time. Discovery is
23 ongoing and continuing.

24 **SPECIAL INTERROGATORY NO. 10**

25 For each date identified in response to Interrogatory No. 8, state the volume of solid
26 waste removed from the settling basin.

27 **RESPONSE NO. 10**

28 Responding Party objects that this interrogatory is vague and ambiguous as to the

1 meaning of the term “solid waste,” and the term “removed” as it is used in this context.

2 Subject to and without waiving said objections, Responding Party responds as follows:

3 N/A; see response to Interrogatory No. 9. Discovery is ongoing and continuing.

4 **SPECIAL INTERROGATORY NO. 11**

5 IDENTIFY all dates from when you acquired ownership of the SITE when the
6 lagoon depicted in Photograph 2 in the attached Exhibit A was emptied of wastewater.

7 **RESPONSE NO. 11**

8 Responding Party objects that this interrogatory is vague and ambiguous as to the
9 meaning of the term “wastewater,” and vague, ambiguous, and unintelligible as phrased,
10 because, as defined, the term “IDENTIFY” relates to persons or documents, not dates or
11 times. Subject to and without waiving said objections, Responding Party responds as
12 follows:

13 The lagoon has never been empty during CMC Land Holdings LLC’s ownership
14 of the property. Discovery is ongoing and continuing.

15 **SPECIAL INTERROGATORY NO. 12**

16 For each date identified in response to Interrogatory No. 11, state the volume of solid
17 waste accumulated at the bottom of the lagoon.

18 **RESPONSE NO. 12**

19 Responding Party objects that this interrogatory is vague and ambiguous as to the
20 meaning of the term “solid waste,” and the term “accumulated” as it is used in this context.
21 Subject to and without waiving said objections, Responding Party responds as follows:

22 N/A; see response to Interrogatory No. 11.

23 **SPECIAL INTERROGATORY NO. 13**

24 For each date identified in response to Interrogatory No. 11, state the volume of solid
25 waste removed from the lagoon.

26 **RESPONSE NO. 13**

27 Responding Party objects that this interrogatory is vague and ambiguous as to the
28 meaning of the term “solid waste,” and the term “removed” as it is used in this context.

1 Subject to and without waiving said objections, Responding Party responds as follows:

2 N/A; see response to Interrogatory No. 11.

3 **SPECIAL INTERROGATORY NO. 14**

4 IDENTIFY the date or dates when a notch was created on the embankment between
5 the settling basin and the lagoon as depicted in Photograph 3 in the attached Exhibit A.

6 **RESPONSE NO. 14**

7 Responding Party objects that this interrogatory is vague and ambiguous as to the
8 meaning of the term “notch” as it is used in this context, and vague, ambiguous, and
9 unintelligible as phrased, because, as defined, the term “IDENTIFY” relates to persons or
10 documents, not dates or times. Subject to and without waiving said objections, Responding
11 Party responds as follows:

12 Responding Party is informed and believes the referenced “notch” was
13 created between approximately May 2015 and July 2015. Discovery is ongoing
14 and continuing.

15 **SPECIAL INTERROGATORY NO. 15**

16 State the name, address, and telephone number of each person who modified the
17 berm between the settling basin and the lagoon as depicted in Photograph 3 in the attached
18 Exhibit A.

19 **RESPONSE NO. 15**

20 Responding Party objects that this interrogatory is vague and ambiguous as to what is
21 meant by the term “modified” as used in this context. Responding Party also objects that
22 this interrogatory is vague as to time and, if intended to seek information about events that
23 occurred before Responding Party purchased the property, seeks information that is wholly
24 speculative. Subject to and without waiving said objections, Responding Party responds as
25 follows:

26 Tony Machado, c/o Jeffrey S. Kaufman of Berliner Cohen LLP, 2844 Park Avenue,
27 Merced, CA 95348; (209) 385-0700. Discovery is ongoing and continuing.

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1 **SPECIAL INTERROGATORY NO. 16**

2 IDENTIFY whether any of the manure waste from the lagoons or ponds at the dairy
3 on 1318 South Washington Road was disposed of in the lagoon at the SITE.

4 **RESPONSE NO. 16**

5 Responding Party objects that this interrogatory is vague and ambiguous as to the
6 meaning of the terms/phrases "manure waste" and "disposed of" as used in this context, and
7 vague, ambiguous, and unintelligible as phrased, because, as defined, the term
8 "IDENTIFY" relates to persons or documents, not events or occurrences, as it is used in this
9 interrogatory. Responding Party also objects that the interrogatory is phrased in the
10 disjunctive (i.e., "lagoons or ponds"), which violate Code of Civil Procedure section
11 2030.060(f). Responding Party also objects that this interrogatory is vague as to time and, if
12 intended to seek information about events that occurred before Responding Party purchased
13 the property, seeks information that is wholly speculative. Subject to and without waiving
14 said objections, Responding Party responds as follows:

15 Manure waste from the lagoons or ponds at the dairy on 1318 South Washington
16 Road was not disposed of in the lagoon at the SITE.

17 **SPECIAL INTERROGATORY NO. 17**

18 If YOUR response to Interrogatory No. 16 is "yes", IDENTIFY the volume of
19 manure waste disposed of in the lagoon at the SITE.

20 **RESPONSE NO. 17**

21 Responding Party objects that this interrogatory is vague and ambiguous as to the
22 meaning of the terms/phrases "manure waste" and "disposed of" as used in this context, and
23 vague, ambiguous, and unintelligible as phrased, because, as defined, the term
24 "IDENTIFY" relates to persons or documents, not a measurement or quantity as it is used in
25 this interrogatory. Subject to and without waiving said objections, Responding Party
26 responds as follows:

27 N/A; Responding Party did not respond "yes" to Interrogatory No. 16.

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1 **SPECIAL INTERROGATORY NO. 18**

2 IDENTIFY whether any of the manure waste from the lagoons or ponds at the dairy
3 on 1318 South Washington Road was disposed of in the settling basin at the SITE.

4 **RESPONSE NO. 18**

5 Responding Party objects that this interrogatory is vague and ambiguous as to the
6 meaning of the terms/phrases “manure waste” and “disposed of” as used in this context, and
7 vague, ambiguous, and unintelligible as phrased, because, as defined, the term
8 “IDENTIFY” relates to persons or documents, not events or occurrences, as it is used in this
9 interrogatory. Responding Party also objects that the interrogatory is phrased in the
10 disjunctive (i.e., “lagoons or ponds”), which violate Code of Civil Procedure section
11 2030.060(f). Responding Party also objects that this interrogatory is vague as to time and, if
12 intended to seek information about events that occurred before Responding Party purchased
13 the property, seeks information that is wholly speculative. Subject to and without waiving
14 said objections, Responding Party responds as follows:

15 Manure waste from the lagoons or ponds at the dairy on 1318 South Washington
16 Road was not disposed of in the settling basin at the SITE.

17 **SPECIAL INTERROGATORY NO. 19**

18 If YOUR response to Interrogatory No. 18 is "yes", IDENTIFY the volume of
19 manure waste disposed of in the settling basin at the SITE.

20 **RESPONSE NO. 19**

21 Responding Party objects that this interrogatory is vague and ambiguous as to the
22 meaning of the terms/phrases “manure waste” and “disposed of” as used in this context, and
23 vague, ambiguous, and unintelligible as phrased, because, as defined, the term
24 “IDENTIFY” relates to persons or documents, not a measurement or quantity as it is used in
25 this interrogatory. Subject to and without waiving said objections, Responding Party
26 responds as follows:

27 ///

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1 N/A; Responding Party did not respond "yes" to Interrogatory No. 18.

2
3 Dated: September 22, 2016

DIEPENBROCK ELKIN GLEASON LLP

4
5 By: 

6 Nicole R. Gleason
7 Jonathan R. Marz
8 Attorneys for
9 CMC LAND HOLDINGS LLC
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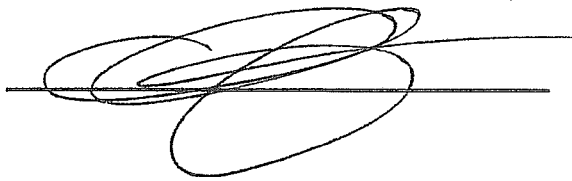
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VERIFICATION

I, Clarence Oliveira, declare:

I am a member of CMC LAND HOLDINGS LLC, and am authorized to make this verification on its behalf. I have read the foregoing "RESPONSE TO SPECIAL INTERROGATORIES" and know its contents. I am informed and believe that the matters stated herein are true and on that ground certify or declare under penalty of perjury under the laws of the State of California that the same are true and correct.

Executed at Turlock, California on September 22, 2016.



1 Re: *In the Matter of the Investigation of CMC Land Holdings LLC*

2 **PROOF OF SERVICE**

3 I, the undersigned, declare:

4 I am a citizen of the United States, employed in the City and County of Sacramento,
5 California. My business address is 500 Capitol Mall, Suite 2200, Sacramento, California
95814. I am over the age of 18 years and not a party to the within action.

6 On September 22, 2016 I served the attached, and all exhibits thereto:

7 **RESPONSE TO SPECIAL INTERROGATORIES**

8 ☒ (BY U.S. MAIL) I placed such sealed envelope, with postage thereon fully prepaid
9 for first-class mail, for collection and mailing at Diepenbrock Elkin Gleason LLP,
10 Sacramento, California, following ordinary business practices as addressed as
follows; or

11 ☐ (BY PERSONAL SERVICE) I caused each such envelope to be delivered by hand
12 to the addressees at the addresses listed below; or

13 ☐ (VIA FACSIMILE) I caused each such document to be sent by facsimile machine
14 number (916) 446-2640 to the following persons or their representative at the
addresses and the facsimile numbers listed below; or

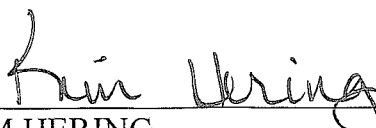
15 ☐ (VIA EMAIL) I caused each such document to be sent by electronic mail to the
addressees at the email addresses listed below; or

16 ☐ (VIA FEDERAL EXPRESS) I caused each such envelope to be delivered via
17 Federal Express overnight service to the addressees at the addresses listed below.

18 ***Attorneys for State Water Resources Control Board***

19 Christian Carrigan
20 David Boyers
21 Vanessa Young
22 State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100
Phone: (916) 327-8622
Fax: (916) 341-5896

23
24 I declare under the penalty of perjury under the laws of the state of California that the
25 foregoing is true and correct. Executed at Sacramento, California, on September 22,
2016.

26 
27 KIM HERING

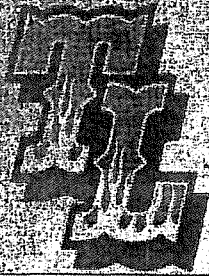
Nicole Gleason

From: Mike Borba <mborba25@aol.com>
Sent: Thursday, September 15, 2016 4:40 PM
To: Nicole Gleason; George Rodarakis
Subject: Fwd: John Nunes Dairy Dispersal Saturday, June 14, 2014

Sent from my iPhone

Begin forwarded message:

From: "Turlock Livestock Auction Yard, Inc." <ucprop@yahoo.com@ccsend.net>
Date: June 12, 2014 at 2:17:10 PM PDT
To: mborba25@aol.com
Subject: John Nunes Dairy Dispersal Saturday, June 14, 2014
Reply-To: ucprop@yahoo.com



TURLOCK LIVESTOCK AUCTION YARD

Complete Dairy Dispersal
for
John Nunes Dairy
Turlock, Ca
Saturday, June 14, 2014
10:00 am

Join Our Mailing List!

Contact Information

**Turlock Livestock
Auction Yard, Inc.**

(209) 634-4326

Max Olvera

1000 Holstein Cows Milking & Dry

Mr. Nunes and Family have been in the dairy business in the Turlock Area for over 35 Years. This herd represents many years of AI Breeding with a 8 Gal. herd avg., milking 2x with no BST & 180k SCC. Mr. Dairyman, this is a great opportunity to increase production with quality cows. Bulk tank sample results will be available on sale day. This sale will be held at the Turlock Livestock Auction Yard. We will make arrangements to accomodate out of state buyers by caring and milking cows to allow for health requirements.

Also Offering

**9000 +/- gallons of
California Dairies, Inc.
Shipping Rights / Entitlements**

Offered at auction at
Turlock Livestock Auction Yard

**1:00 pm on
Saturday, June 14, 2014**

You may be on a minimum of 1000 gallons with the option to take it all if you are the successful bidder. A 10% deposit will be required on sale day. Sale subject to CDI Board Approval and successful close of escrow.

(209) 277-2063

Steve Faria

(209) 988-7180

Karen Cozzitorto

(209) 634-4326

Chuck Cozzitorto

(209) 652-4479

Buddy Cozzitorto

(209) 652-4480

Brandon Baba

(209) 480-1267

John Luiz

(209) 480-5101

Eddie Nunes

(209) 604-6848

Jake Bettencourt

(209) 262-4019



**Steve Faria
Broker**

(209) 988-7180


**Selling Agriculture
since 1987**

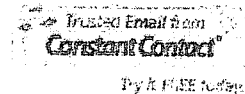
**We currently have
buyers interested in
property in the Hilmar
and West Turlock Area.**

**Thinking about selling
or buying give us a
call.**

www.turlockre.com

Forward email

 **SafeUnsubscribe**



This email was sent to mborba25@aol.com by ucprop@yahoo.com |
[Update Profile/Email Address](#) | Instant removal with [SafeUnsubscribe™](#) | [Privacy Policy](#).
Turlock Livestock Auction Yard, Inc. | 10430 N. Lander Ave. | Turlock | CA | 95380

CMC Manure Tracking Spreadsheet

Transported Manure from CMC to Peterson in Turlock

| | # of Loads | |
|-----------|------------|-----------|
| 7/10/2014 | 45 | 900 Yards |

Transported Manure from CMC to Soares & Borba in Turlock

| | # of Loads | |
|-----------|------------|-------------|
| 9/29/2014 | 61 | 1,220 Yards |

Transported Manure from CMC to DSL on West Main in Turlock

| | # of Loads | |
|-----------|------------|-----------|
| 11/4/2014 | 20 | |
| 4/20/2015 | 25 | |
| Total | 45 | 900 Yards |

Transported Manure from CMC to DAS in Stevinson

| | # Of Loads | |
|-----------|------------|--------------|
| 7/10/2014 | 40 | |
| 7/11/2014 | 15 | |
| 7/14/2014 | 25 | |
| 7/15/2014 | 23 | |
| 7/16/2014 | 25 | |
| 7/23/2014 | 18 | |
| 7/24/2014 | 12 | |
| 8/12/2014 | 12 | |
| 8/13/2014 | 4 | |
| 8/27/2014 | 20 | |
| 8/28/2014 | 23 | |
| 9/4/2014 | 26 | |
| 9/5/2014 | 56 | |
| 9/8/2014 | 32 | |
| 9/25/2014 | 61 | |
| 11/3/2014 | 56 | |
| 11/4/2014 | 27 | |
| 11/4/2014 | 24 | Sand |
| 4/8/2015 | 58 | |
| 4/9/2015 | 26 | |
| 4/20/2015 | 36 | |
| 10/3/2015 | 42 | |
| 10/5/2015 | 41 | |
| 10/6/2015 | 11 | |
| 3/2/2016 | 29 | |
| Total | 742 | 14,840 Yards |

| | | |
|--------------------|------------------|---------------------|
| Grand Total | 893 Loads | 17,860 Yards |
|--------------------|------------------|---------------------|

| | | | |
|-----------|----|-----|------|
| 11/3/2014 | 3 | 8 | 160 |
| 11/3/2014 | 5 | 8 | 160 |
| 11/3/2014 | 6 | 6 | 120 |
| 11/3/2014 | 9 | 16 | 320 |
| 11/3/2014 | 10 | 10 | 200 |
| 11/3/2014 | 94 | 8 | 160 |
| 11/4/2014 | 3 | 2 | 40 |
| 11/4/2014 | 5 | 2 | 40 |
| 11/4/2014 | 6 | 1 | 20 |
| 11/4/2014 | 9 | 12 | 240 |
| 11/4/2014 | 10 | 10 | 200 |
| Totals | | 420 | 8400 |